



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

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[nikki.cavazos@cityofrc.us](mailto:nikki.cavazos@cityofrc.us)

Nikki Cavazos, Assistant Planner  
City of Rancho Cucamonga  
10500 Civic Center Dr.,  
Rancho Cucamonga, CA 91730

## **Mitigated Negative Declaration (MND) for the Proposed Hickory Warehouse**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

The Lead Agency proposes the construction and operation of a 215,600-square-foot (sf) high-cube warehouse with unknown occupants on an approximately 9.5-acre site. The MND estimates approximately 362 total vehicle trips, including approximately 138 daily diesel truck trips. In the Air Quality Section, the Lead Agency quantified the project's construction and operation air quality impacts and compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. The Lead Agency determined that localized and regional daily construction and operation emissions are less than significant. The Lead Agency also conducted a health risk assessment (HRA) for the proposed warehouse project.

The SCAQMD staff has concerns about the trip lengths and HRA assumptions in the MND. Details are included in the attachment. After revising the air quality analysis, should the Lead Agency determine that project air quality impacts will exceed the SCAQMD recommended significance thresholds, the identification and evaluation of mitigation measures to reduce impacts below significance levels are required before the consideration of the MND for adoption pursuant to the CEQA Guideline Section 15074(b). Additionally, the SCAQMD staff has included a list of mitigation measures in the attachment to assist the Lead Agency in identifying feasible mitigation measures which have the potential to substantially lessen such significant air quality effects as stated in Public Resources Code Section 21002. In an event that the Lead Agency determines that such significant air quality impacts cannot be mitigated or avoided, a draft environmental impact report shall be prepared pursuant to the CEQA Guideline Sections 15073.5, 15086, and 15087.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality and HRA questions that may arise. Please contact Jack Cheng, Air Quality Specialist – CEQA IGR Section, at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

SBC170120-02

Control Number

## ATTACHMENT

### **Air Quality Analysis**

1. In the Air Quality Climate Change Assessment, the Lead Agency uses an average truck trip length of 17.41 miles according to a “study of metropolitan commercial and freight travel conducted by the National Cooperative Highway Research Program...and data collected in the field for the Southern California Association of Government (SCAG) region.” Most warehouses, distribution centers, and industrial land use projects would be hauling consumer goods, often from the Ports of Long Beach and Los Angeles as well as to destinations outside of SCAQMD boundaries.

- Project site to Port of Los Angeles/Long Beach: 74 miles
- Project site to Banning Pass: 38 miles
- Project site to San Diego County line: 55 miles
- Project site to Cajon Pass: 24 miles
- Project site to downtown Los Angeles: 60 miles

Assuming that 50 percent of all delivery trips will travel to and from the project and the Port of Los Angeles/Long Beach, the use of 17.41 miles as an average truck trip greatly underestimates the air quality impacts. In order to ensure that the MND conservatively evaluates the potential for air quality impacts, the SCAQMD staff recommends the Lead Agency utilize a trip length that is reflective of the potential truck trips or limit the truck trip miles allowed to levels analyzed in the MND. If higher truck trip miles are anticipated or required, the Lead Agency should update the Air Quality Impact Analysis, Health Risk Assessment and Final CEQA document to disclose this impact to the public.

### **Health Risk Assessment (HRA) Analysis**

2. The SCAQMD staff is concerned that the Health Risk Assessment (HRA) has underestimated the cancer risk from the proposed project. In the HRA, the Lead Agency used the AERMOD dispersion model to estimate DPM concentrations from the diesel vehicles generated by the proposed project and used the 2015 revised OEHHA guidelines to estimate the health risks to sensitive receptors in the project vicinity. The SCAQMD staff recommends that the Lead Agency revise the HRA based on the following comments, which are intended to assist the Lead Agency in assessing the potential cancer risk attributable to the proposed project.
  - a) In the air dispersion modeling the Lead Agency used the non-default option “FASTALL.” The SCAQMD staff recommends using the regulatory default options or providing justification for using the non-default FASTALL option.
  - b) On-site idling was modeled as a single point source. On-site idling sources should span the entire docking area. The SCAQMD staff recommends that the Lead Agency revise the HRA using a line volume source that spans the entire docking area and include 15 minutes of idling to ensure that impacts are properly analyzed.

- c) All on-site and off-site travel emissions were modeled as elevated area sources. The SCAQMD staff recommends that the Lead Agency revise the HRA using a series of volume source or provide a rationale to justify the assumptions.
- d) The HRA analysis involved the use of a 100-meter spacing receptor grid and discrete receptors placed over existing residential structures. Receptor locations should be placed at the boundaries of the residential property and not the residential structure. Placing receptors on the residential structure underestimates cancer risks to the residents. The SCAQMD staff recommends that the Lead Agency revise the model and start the grid at the property boundaries to ensure potential maximum concentrations are identified.
- e) Light Heavy Duty (LHD) truck emissions were not included in the emission calculations and HRA. By not including LHD truck emissions, the Lead Agency likely underestimated health risks. The SCAMQD staff recommends that the Lead Agency revise the HRA to include LHD truck emissions.
- f) The 2015 revised OEHHA guidelines acknowledge that children are more susceptible to the exposure to air toxics and have revised the way cancer risks are estimated to take this into account. Since the emissions from the project-generated trucks get cleaner with time due to existing regulations, it would not be appropriate to average out the emissions over the 30-year exposure duration since this would underestimate the health risks to children who would be exposed to higher DPM concentrations during the early years of project operation. Therefore, the SCAQMD staff recommends that the DPM emissions for each year of operation be applied to each of the corresponding age bins (i.e. emissions from Year 1 of project operation should be used to estimate cancer risks to the third trimester to 0 year age bin; Year 1 and 2 of project operation should be used to estimate the cancer risks to the 0 to 2 years age bins; and so on).
- g) In the HARP RES30YR\_CancerRiskHRA, the Lead Agency used the “OEHHA Derived Method” intake Rate Percentile Method. The SCAQMD staff recommends revising the HRA using the “RMP using the Derived Method” for Intake Rate Percentile and include “Dermal,” “Mother’s Milk,” and “Homegrown Produce” as pathways to evaluate.

### **Operational Mitigation Measures – Mobile Sources**

3. Should the Lead Agency determine after further analyses that project impacts will exceed the SCAQMD recommended significance thresholds, the following mitigation measures are recommended to assist the Lead Agency in reducing such significant impacts from mobile source operations in addition to the mitigation measures included in the MND starting on page 21 and 75. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and/or operation to minimize any significant impacts. In the event that the proposed project generates significant adverse air quality impacts, information on potential mitigation measures as guidance to the Lead

Agency are available on the SCAQMD CEQA Air Quality Handbook website.<sup>1</sup> Examples of potential mitigation measures for the Lead Agency to consider may include the following:

- a. Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- b. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- c. Limit the daily number of trucks allowed at the facility to levels analyzed in the Final MND. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this land use or higher activity level.
- d. Provide electric vehicle (EV) Charging Stations (see the discussion below under "f." regarding EV charging stations).
- e. Should the proposed project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency and project applicant.
- f. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed warehouse and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.<sup>2</sup> Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

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<sup>1</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook> .

<sup>2</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)

- g. Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the warehouse/distribution center and sensitive receptors.
- h. Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- i. Design the warehouse/distribution center such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility.
- j. Design the warehouse/distribution center to ensure that truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- k. Restrict overnight parking in residential areas.
- l. Establish overnight parking within the warehouse/distribution center where trucks can rest overnight.
- m. Establish area(s) within the facility for repair needs.
- n. Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- o. Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.